



Leaders in Public Safety Communications™

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March 27, 2012

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: *Ex Parte Notice, WT Docket No. 11-69, ET Docket No. 09-234*

Dear Ms. Dortch:

We are writing to urge the Commission to take appropriate steps to prevent the introduction of radio equipment that could lead to dangerous interference to public safety communications or undermine interoperability.

APCO International submitted comments on June 27, 2011, in response to the Commission's *Notice of Proposed Rulemaking*, FCC 11-63 ("NPRM"), in the above-referenced proceedings regarding the introduction of Terrestrial Trunked Radio ("TETRA") technology equipment in the United States. As we explained, APCO International is technology neutral, provided that the introduction of new technologies in public safety spectrum does not undermine interoperability or create potential interference to existing radio systems. Thus, we expressed concern that TETRA equipment does not appear to be compatible with either Project 25 or other important interoperability requirements in the Commission's rules. The Commission's record in response to the *NPRM* also includes evidence that TETRA operations could create interference to public safety and other radio communications.

Last fall, the Commission made clear that its authorization for TETRA deployment in the United States does not extend to public safety spectrum. *Order on Clarification*, WT Docket No. 11-69 and ET Docket No. 09-234, 26 FCC Rcd 13360 (released September 28, 2011). Nevertheless, as Harris Corporation notes in a recent letter to the Commission, dated March 16, 2012, a vendor is currently seeking to deploy TETRA equipment on public safety spectrum, claiming that it will operate at "low power" and therefore not cause interference. Harris Corporation demonstrates in its letter, however, that even such "low power" TETRA operations could interfere with adjacent channel public safety communications. APCO International agrees with that analysis.

Therefore, we urge the FCC to prevent the introduction of TETRA or other technologies where there is evidence that such equipment could lead to interference to public safety radio communications or harm critical interoperability within public safety spectrum.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregory T. Riddle".

Gregory T. Riddle, President

cc: Julius Knapp, Chief, OET
Admiral Jamie Barnett, Chief, PSHSB